



September 27, 2012

Electronically Submitted

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Facilitating the Deployment of Text-to-911 and Other Next Generation
Applications, PS Docket No. 11-153 and
Framework for Next Generation 911 Deployment, PS Docket No. 10-255

Dear Ms. Dortch,

On September 25, 2012, I met with David Turetsky, Chief of the Public Safety and Homeland Security Bureau, and Patrick Donovan and Dana Zelman also of that Bureau. I described to them Neustar's Text-to-9-1-1 concept that enables SMS messages from mobile handsets to be routed to the correct Public Safety Answering Point ("PSAP") using TTY capabilities that are already present in the PSAP. I also explained how this solution includes the capability to handle more advanced texting formats as either the carrier or the PSAP evolves their capabilities to Next Generation 9-1-1. I explained to Mr. Turetsky that this capability had been demonstrated to Commission Chairman Julius Genachowski using commercial location information, that it has been tested with several PSAPs and is now included in the Alliance for Industry Solutions ("ATIS") incubator process. During the course of the meeting, I encouraged them to ensure that interim text-to-9-1-1 solutions can be implemented without significant investment by carriers or PSAPs. I also recommended that carriers should have flexibility in choosing their solution, but care should be taken to ensure that varying solutions are consistent, to the extent possible, with respect to the users' experience and the PSAPs' requirements. Finally, I expressed the view that resolution of the liability issues involving text-to-9-1-1 remain a large concern.

The attached diagram and sample dialogue was shared at the meeting.

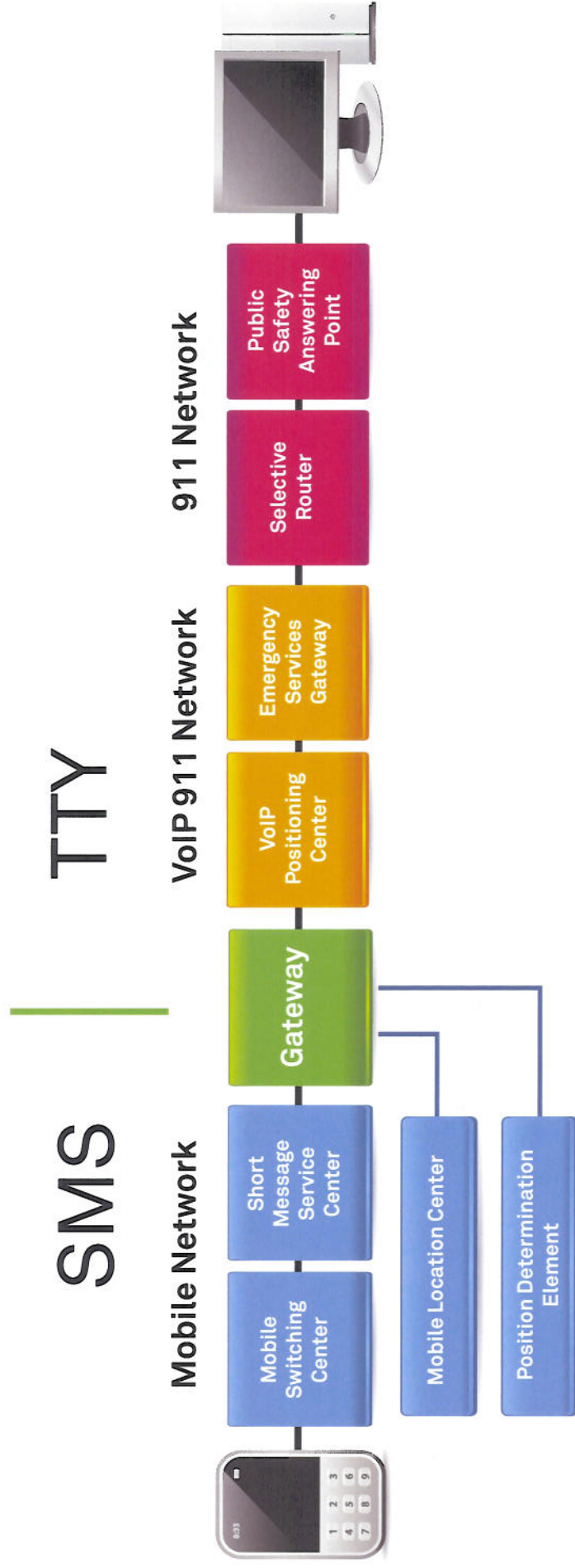
Sincerely,

A handwritten signature in dark ink, reading "Richard L. Fruchterman, III". The signature is fluid and cursive, with a large, stylized "R" at the beginning and a circular flourish at the end.

Richard L. Fruchterman, III
Associate General Counsel

cc: David Turetsky
Patrick Donovan
Dana Zelman

Neustar® SMS to 9-1-1 Proposal



neustar®

Typical Call Sequence

